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July 26, 2023

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VIA ECF

Hon. Lawrence E. Kahn
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 424
Albany, NY 12207

Hon. Christian F. Hummel
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207

RE: *Gibson v K R J S Corporation d/b/a Kavi Gupta Gallery*
Case No. 1:23-cv-00557 (LEK/CFH)

Dear Judge Kahn and Magistrate Judge Hummel:

This office has been retained by K R J S Corporation d/b/a Kavi Gupta Gallery (“Defendant”) in connection with the above-referenced matter. Simultaneously herewith, I have entered an appearance on behalf of Defendant. This office is aware that the Clerk of the Court entered a default against Defendant on June 22, 2023 (Doc. 6) and that Plaintiff Jeffrey Gibson (“Plaintiff”) moved for default judgment against Defendant by notice of motion dated July 14, 2023 (Doc. 9). Please be advised that Defendant intends to (1) oppose Plaintiff’s motion for default judgment, (2) move to set aside the default entered against Defendant, and (3) interpose an Answer with Counterclaims.

To the extent there is a conference scheduled for August 7, 2023 at 9:30 a.m., Defendant respectfully requests an adjournment of said conference to allow the Defendant time to file an Answer and to allow the parties to meet and confer regarding a Civil Case Management Plan.

Please do not hesitate to contact me should you have any questions regarding the foregoing.

Respectfully Submitted,

HARRIS BEACH PLLC

s/ Svetlana K. Ivy

Svetlana K. Ivy

cc: All Counsel of Record (*via ECF*)